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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ANDREA LOVE, an individual,

Plaintiff,

vs.

ELLEN STONE, an individual; and DOES 1
through 25, inclusive

Defendants.

Case No.: 2:23-cv-3122

**PLAINTIFF ANDREA LOVE'S
DECLARATION IN SUPPORT OF
NOTICE OF MOTION AND MOTION TO
REMAND REMOVED ACTION**

(28 U.S.C.S. §1447(c))

Complaint Filed: 2.28.2023

LASC Case No.: 23STCV04399

1. I, Andrea Love, declare that: I am the Plaintiff of record in the above-entitled action. I was the personal assistant of Defendant Ellen Stone ("Defendant") for over six years prior to the commencement of this action. If called upon to testify, I could and would competently testify as to the facts stated herein based upon my own personal knowledge.

2. Defendant moved to Los Angeles, California in 2016 to be closer to her daughters and to join the D.A.R.E. community, as per her own handwritten journal and comments made to

1 me, which is explicitly written in her own handwriting in her journal which is in the first
2 paragraph of the holographic note submitted herein as evidence. Defendant would routinely have
3 me transcribe journal notes for her over the years and this was one of them.

4 3. Defendant had her bank statements sent to her residence in Los Angeles for years.

5 4. Defendant signed up for an out of state driver's license renewal program which is
6 only reserved for students or military folks and took her driving test at the Los Angeles
7 Department of Motor Vehicles located at 1909 Kinross Avenue Los Angeles, CA 90024.

8 5. Defendant has maintained a façade that she has ties to Chicago to avoid paying
9 California taxes as she had on at least one occasion explicitly told me so and as revealed by her
10 schemes such as where she pressured employees to declare that they were fired or needed to
11 collect covid pay and paid them in checks made out to cash.

12 6. Defendant has lived in Los Angeles continuously through the date of the filing of
13 this lawsuit (she resided in Los Angeles for over 95% of the time for years including through the
14 filing date of this complaint), and, for example Defendant was served with the instant complaint
15 in person at her Los Angeles home and had a pest control appointment that she personally
16 coordinated about a week before the instant complaint was filed.

17 7. Defendant is a Block Captain with the Los Angeles Miracle Mile Residential
18 Association ("MMRA") which requires her to oversee 100 people, work with local police, and
19 crucially in order to join as a block captain for the MMRA she represented to that committee that
20 "her primary residence is within the boundaries of the MMRA Wilshire Boulevard on the north;
21 San Vicente Blvd., on the south; La Brea Avenue on the east; and Fairfax Avenue on the west" as
22 per the MMRA website.

23 8. I have in my possession flight records that disclose the entire amount of time to my
24 knowledge that Defendant was in Chicago during my time of employment with her which was for
25 a total of 74 days over the course of six years and two months. I hereby reinforce that my
26 testimony under oath is that Defendant Ellen Stone was not in Illinois for more than 74 days to
27 my knowledge in the over six years I had worked for her. Specifically, I declare that from June
28 2016 through September 26, 2022, I was the person that drove Defendant to the airport. From

1 June 2016 to September 2022 Defendant only went to Chicago from October 10-15, 2016
 2 (American Airlines Record Locator: YEVSCE); and February 28 – March 7 2019 (American
 3 Airlines Record Locator: OPSSSQ)); May 27 – June 2, 2019 (7 days) and July 23 – September
 4 14, 2021 (54 days) (American Airlines Record Locator: QQVIRN) Defendant has lived in Los
 5 Angeles continuously through the date of the filing of this lawsuit (Defendant was physically
 6 present in Los Angeles for over 90% of the time for many years including through the filing date
 7 of this complaint), and, for example Defendant was served with the instant complaint in person at
 8 her Los Angeles home, and had a pest control appointment that she personally coordinated about
 9 a week before the instant complaint was filed.

10 9. Defendant elected to have numerous surgeries in Los Angeles over the years.

11 10. Defendant uses many doctors in Los Angeles that Defendant has seen over the
 12 years, which was coordinated by me.

13 11. Due to my position as Defendant's personal assistant, I have copious records to
 14 demonstrate that Defendant lived in Los Angeles continuously for the better part of a decade
 15 (aside from my testimony as to the same) and during my term of employment with her, and
 16 among those items are the following which I submit to this Court for consideration:

- 17 • **Exhibit A:** The previously referenced handwritten note from Defendant describing her
 18 move to Los Angeles in her journal, which is in paragraph one of said holographic
 19 note.
- 20 • **Exhibit B:** A sheet list of Block Captains for Defendant's neighborhood which
 21 identifies that Defendant was a "block captain" for her neighborhood in Los Angeles,
 22 which is a hyper local commitment, and had served in that role more than once and a
 23 screenshot off the MMRA website which states explicitly that join the membership of
 24 the MMRA at all let alone to be a leader one must represent that their primary
 25 residence is in Los Angeles.
- 26 • **Exhibit C:** A list of doctors Defendant has visited, consulted with or regularly seen
 27 over the past 8 years.
- 28 • **Exhibit D:** A signed lease for another property in Los Angeles Defendant maintained

1 in Santa Monica.

- 2 • **Exhibit E:** A lease for a third separate property located on the beachfront of the
- 3 Pacific Coast in Los Angeles, which extends through July 5, 2023.
- 4 • **Exhibit F:** An Investment Letter addressed to Defendant in Los Angeles.
- 5 • **Exhibit G:** Lease Extensions for her 843 S Genesee Avenue Los Angeles, CA 90036
- 6 property.
- 7 • **Exhibit H:** A receipt for Defendant's driver's license test which she took in Los
- 8 Angeles.
- 9 • **Exhibit I:** Redacted documents that pertain to various surgical operations that
- 10 Defendant has had over the years in Los Angeles.
- 11 • **Exhibit J:** Vet records for Defendant's dog which of course took place in Los
- 12 Angeles.
- 13 • **Exhibit K:** Documents that pertain to smog checks that Defendant had done on her car
- 14 in Los Angeles.
- 15 • **Exhibit L:** A screen shot of a text message exchange which reveals that Defendant
- 16 was home for a pest control service eight days before the filing of the complaint that
- 17 initiated the action.

18
19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct. Executed this 16 day of June 2023, in Los Angeles, California.

21 /s/ Andrea Love

22 Andrea Love